

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SHINSHO AMERICAN CORPORATION §
§
Plaintiff, §
§
vs. § CIVIL ACTION NO. 4:20-cv-00577
§
HYQUALITY ALLOYS, LLC § JURY DEMAND
§
Defendant. §

**SUPPLEMENT TO SHINSHO AMERICAN CORPORATION'S
MOTION FOR CONTEMPT**

On Tuesday March 16, 2021, Shinsho American Corporation (“Shinsho”) filed and served its *Emergency Motion for Contempt* because of ongoing and significant violations by HyQuality Alloys, LLC (“HQA”) of this Court’s Agreed Preliminary Injunction. On Wednesday March 17, 2021 at approximately 3:15 p.m., the Court scheduled a hearing to address Shinsho’s Motion for Contempt. (Dkt. 42).

Incredibly, even after HQA received notice of the Motion for Contempt, and even after the Court set the Motion for Contempt for hearing this Friday, HQA has continued to blatantly ignore this Court’s authority by making two more shipments in willful and direct violation of the Protective Order. Those additional shipments are as follows:

March 17, 2021 Shipment at Approximately 3:15 p.m. (after the Motion for Contempt was filed and served)



On March 17, 2021, four bars were shipped from HQA's facility, but only two had identifying information as noted in the picture above. Bar #446334 (marked on bar) corresponds to Heat Code 635607 (listed on page 1 of the Subject Bar list governed by the PI Order), and Bar #446419 (marked on bar) corresponds to Heat Code 635575 (listed on page 1 of the Subject Bar list governed by the PI Order). From a zoom in of the picture, both bars also have a "Shinsho America Corporation" label and other identifying information. As such, both bars are unquestionably governed by the terms of this Court's PI Order.

March 18, 2021 at Approximately 8:30 a.m. (after the Court set the Motion for Contempt for hearing)



The above pictures show 10 bars leaving HQA's facility this morning, March 18, 2021 at approximate 8:30 a.m. There are many markings, but only the fourth bar from the right was readable from the picture. That is Bar 447775 (marked on bar), which corresponds to Heat Code 8080964Z (listed on page 27 of the Subject Bar list governed by the PI Order). As such, this bar (and likely the other nine) are also all unquestionably governed by the PI Order.

HQA's counsel was made aware of these additional violations yesterday, and again this morning, and Shinsho's intent to raise these additional violations during the conference with the Court tomorrow.

Dated: March 18, 2021

Respectfully submitted,

/s/ Charles B. Hampton
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served to counsel of record via the Court's ECF system on March 18, 2021.

/s/ Charles B. Hampton
Charles B. Hampton